

QUIN DENVIR, Bar #49374  
Federal Defender  
DENNIS S. WAKS, Bar #142581  
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Attorney for Defendant  
CARRIE MARIE SULAK

IN THE UNITED STATES DISTRICT COURT  
FOR THE EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,	)	No. CR.S-04-0218 MCE
	)	
Plaintiff,	)	
	)	STIPULATION AND <del>{PROPOSED}</del> ORDER
v.	)	
	)	
CARRIE MARIE SULAK, et al.	)	Date: October 4, 2005
	)	Time: 8:30 a.m.
Defendants.	)	Judge: Hon. Morrison C. England
	)	
_____	)	

It is hereby stipulated and agreed to between the United States of America though Phil Ferrari, Assistant U.S. Attorney; defendant, CARRIE MARIE SULAK, by and through her counsel, Dennis S. Waks, Supervising Assistant Federal Defender; and defendant, JOSEPH W. MCALLISTER, by and through his counsel, William J. Portanova, that the status conference of August 30, 2005 be vacated and a further status conference be set for October 4, 2005 at 8:30 a.m.

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1        This continuance is being requested because defense counsel  
2 requires additional time to obtain discovery, continue our  
3 investigation, and to interview our clients and other witnesses.  
4 Furthermore, the parties are negotiating a plea agreement and need time  
5 to reduce it to writing and provide it to the Court. Both Defense  
6 counsel need time to discuss the plea with the prosecutor and with the  
7 defendants.

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Speedy trial time is to be excluded from the date of this order through the date of the status conference set for October 4, 2005, pursuant to 18 U.S.C. § 3161(h)(8)(B)(iv) and Local Code T4 based upon continuity of counsel and defense preparation.

Dated: August 25, 2005

Respectfully submitted,

QUIN DENVIR  
Federal Defender

/s/ Dennis S. Waks

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DENNIS S. WAKS  
Supervising Assistant Federal  
Defender  
Attorney for Defendant  
CARRIE MARIE SULAK

/s/ Dennis S. Waks for

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WILLIAM J. PORTANOVA  
Attorney for Defendant  
JOSEPH W. MCALLISTER

Dated: August 25, 2005

MCGREGOR W. SCOTT  
United States Attorney

/s/ Dennis S. Waks for


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PHIL FERRARI  
Assistant U.S. Attorney

O R D E R

IT IS SO ORDERED.

Dated: August 30, 2005



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MORRISON C. ENGLAND, JR.  
UNITED STATES DISTRICT JUDGE